

Hazard Communication Program

2007

IOWA DEPARTMENT OF ADMINISTRATIVE SERVICES GENERAL SERVICES ENTERPRISE (DAS / GSE)

HAZARD COMMUNICATION PROGRAM

PURPOSE

The Department of Administrative Services, General Services Enterprise (DAS / GSE) Hazard Communication Program has been developed to enhance the safety of employees in the workplace and to establish compliance with the standards identified in 29 CFR, 1910.1200.

This program document, a listing of hazardous chemicals or materials, and material safety data sheets (MSDS) are kept in a file or binder in each affected location on the State of Iowa Capitol Complex, Ankeny Labs, and all other locations (custodial office, etc). The file or binder is readily available and accessible for review by all interested parties.

RESPONSIBILITIES

DAS/GSE is firmly committed to providing a safe and healthy work environment for each of its employees. This program establishes minimum safe procedures and guidelines for employees working with hazardous chemicals or materials.

DAS / GSE is responsible for providing education and training to all employees who work in Architecture and Engineering Services, Capitol Complex Maintenance Services, Fleet and Mail Services, Procurement Services, Lease and Space Management Services, and Employee Safety Programs who may be exposed to hazardous chemicals or materials in their work area. Work area specific training will be conducted prior to an employee's first exposure to any chemical or material (either in a classroom or on the job). Additional training will be conducted whenever a hazard changes (MSDS change or process change) and whenever a new hazardous chemical or material is introduced into their work area. Employees will be trained in all aspects outlined in section "VI. Information and Training."

CONTAINER LABELING

The supervisor responsible for the designated work area receiving hazardous chemicals or materials that require MSDS will verify that all containers received and used on the Capitol Complex, Ankeny Labs or other remote satellite location are clearly labeled as to the contents and the appropriate hazard warnings. No containers will be released for use until the above requirement is verified by the respective supervisor.

The supervisor is also responsible for assuring that existing labels on incoming containers of hazardous chemicals or materials are maintained, not removed, or defaced. Periodic inspection is required to assure labels are legible and contain appropriate hazard warnings.

If a container has a DOT shipping label, it will not be removed until all residue has been removed from the container.

Each employee is responsible for inspecting the container label prior to use of any hazardous chemical or material.

Each employee who transfers hazardous chemicals or materials into portable containers (such as bottles, spray bottles, parts cleaning cans, etc) is responsible for labeling the portable containers. The label must be legible with the identity of the material at minimum and appropriate hazard warning, if possible.

Definition of **identity**: The identity is any term that appears on the label, the MSDS, and the list of chemicals, and links these three sources of information. The identity used by the supplier may be a common or trade name ("Windex") or a chemical name (1, 1, 1, -trichloroethane).

Definition of **hazard warning**: The hazard warning is a brief statement of the hazardous effects of the chemical ("flammable", causes lung damage"). Labels frequently contain other information, such as precautionary measures ("do not use near open flame"), but this information is provided voluntarily and is not required by the rule.

Labels must be legible and prominently displayed. There are no specific requirements for size or color, or any specified text. OSHA 1910.1200 App E

LIST OF HAZARDOUS CHEMICALS OR MATERIALS

An inventory list that identifies current hazardous chemicals or materials present in the work place will be maintained, updated, and periodically reviewed by each supervisor. This inventory list will be transmitted to the DAS / GSE Safety Office annually during the Tier II initiative. Supervisors are required to cross-reference their inventory list to their MSDSs. A copy of the inventory list will be kept with the MSDSs and serves as an index to aid in identifying and locating necessary information. A copy of the written program should also be incorporated into the MSDS file or binder.

MATERIAL SAFETY DATA SHEETS

It is the responsibility of every supervisor ordering chemicals and products to obtain necessary MSDS for hazardous chemicals or materials. Copies of the MSDSs are required to be sent to the DAS / GSE Safety Office to incorporate into the comprehensive database.

Copies of the MSDSs for the hazardous chemicals or materials that employees may be exposed to will be kept in each work area in a designed holder, file or binder notebook and will be readily available and accessible to all employees or other interested persons for review during each work shift. Copies of these will be made available upon request to the work area supervisor.

Contractors, subcontractors, or other employers working at the Capitol Complex, Ankeny Labs or other remote satellite location are required to bring copies of all MSDSs for hazardous chemicals or materials they bring onto the jobsite. MSDSs are to be readily available and accessible to all employees (contractor's, subcontractor's, other employer's or interested persons who may be or potentially be exposed to the hazardous chemicals or materials.) Upon leaving the job site and the removal of all hazardous materials, contractors, subcontractors or other employers will take their MSDSs and associated information with them.

INFORMATION AND TRAINING

The supervisor is responsible to provide information and regular training to all employees who may be exposed or potentially may be exposed to hazardous chemicals or materials in their work area. Training may be either in the classroom or on the job. It will be presented at the time of their initial job assignment, at the time they

are reassigned to a different work area and whenever a new hazard is introduced into their work area prior to first exposure to the hazardous chemical or material.

Included will be information on the HCP program, any operations in their work area where hazardous chemicals or materials are present, location of the DAS / GSE Hazard Communication Program, hazardous chemicals or materials listing, and material safety data sheets. Additional training is required whenever the hazard changes (MSDS change, process change). Information and training will be designed to cover categories of hazards (flammability, carcinogenicity, etc.) or specific hazardous chemicals or materials. Hazardous chemical or material specific information must always be available through labels and MSDSs.

Employee training will include at least the following:

Overview of the OSHA Hazard Communication Standard.

Details of the DAS / GSE Hazard Communication Program, including the labeling system.

Physical hazards (i.e. flash point, vapor pressure, reactivity, etc.) associated to the specific hazardous chemicals or materials present in his/her department or work area.

Health hazards, including signs and symptoms of exposure, of the specific hazardous chemicals or materials present in his/her department or work area and any medical condition known to be aggravated by exposure to these chemicals.

Procedures to protect against chemical or material hazards (i.e. required personal protective equipment and its proper use and maintenance; work practices or methods to ensure appropriate use and handling of hazardous chemicals or materials; and procedures for emergency response).

Methods and observations that are in place or may be used to detect the presence or release of a hazardous chemical or material in the work area; and work procedures to follow to assure protection when cleaning hazardous chemical or material spills and leaks.

Location of Material Safety Data Sheets (MSDSs), how to read and interpret the information on labels and MSDSs, and how employees may obtain additional hazard information.

Point to stress: if an employee is instructed to use a hazardous chemical or material for which he/she has not been trained, it is their responsibility to inform the employer prior to handling the hazardous chemical or material. This will insure proper training can be given.

Training will be updated any time the hazard changes or a new hazardous chemical or material is introduced into the department or work area.

Training resources are available in the DAS / GSE Safety Office. The supervisor is responsible to periodically review their training program and evaluate its effectiveness.

NON-ROUTINE HAZARDOUS TASKS

Periodically, employees are required to perform non-routine tasks that are hazardous (i.e. confined space entry, boiler clean out, or replacing hazardous chemical piping). Prior to starting work on such tasks; the supervisor will provide each affected employee with information about the hazardous chemicals or materials he/she may encounter during the assigned task. This information will include specific physical and health hazards, protective and safety measures the employee can use, and steps the company is taking to reduce the hazards (i.e. ventilation, respirators, presence of another employee – buddy system, and emergency procedures.) The supervisor will also notify all other employees working in the area prior to the non-routine task being performed.

CONTRACTORS, SUBCONTRACTORS AND OTHER EMPLOYERS

The DAS/ GSE contract manager is responsible for providing every contractor, subcontractor or other employer working in a job site on the Capitol Complex, Ankeny Labs or other remote satellite location with information about the DAS / GSE Hazard Communication Program, the hazardous chemicals or materials they may encounter,

the location of MSDSs, labeling procedures, and suggested precautions for their employees to follow.

It is also their responsibility to obtain pertinent information about the hazardous chemicals or materials used by the contractor, subcontractor or other employer that Capitol Complex, Ankeny Labs or other remote satellite location employees may be exposed to or potentially exposed to (i.e. list of hazardous chemicals or materials, the location of MSDSs, labeling procedures, and suggested precautions, etc.)

It is the responsibility of the contractor, subcontractor, or other employer to properly train employees in all aspects of the Hazard Communication Standard including all hazardous chemicals and materials that they may be exposed to while working at the Capitol Complex, Ankeny Labs or other remote satellite location.

All employees can obtain further information on this written program, the OSHA Hazard Communication Standard, applicable MSDSs, and chemical information lists at the DAS/ GSE Safety Office.

The DAS/ GSE Hazard Communication Program is designed to comply with local, state, and federal regulations applicable to DAS/GSE. The DAS/ GSE Safety Office shall complete a periodic review of the program with the assistance and cooperation of all identified personnel.

DAS/ GSE Hazard Communication Program Responsibilities

DAS Supervisors

- Obtain an MSDS for every hazardous chemical or material received or used on the Capitol Complex *.
- Create an inventory including collected MSDS.
- Maintain, update, and periodically audit all MSDS.
- Archive the MSDS for any hazardous chemical or material no longer located on the Capitol Complex.
- Review all MSDS to identify the personal protective equipment (PPE) required to wear when using the hazardous chemical or material.
- Provide required PPE to employees prior to using a hazardous chemical or material.
- Provide training to new employees prior to exposure to a hazardous chemical or material.
- Provide additional training whenever an employee is reassigned, a hazard changes, or a new hazardous chemical or material enters the work place.
- Assure all labels and warnings are legible and intact.
- Assure DOT shipping labels remain intact until the containers are empty.
- Provide a copy of a MSDS upon request from employees or other interested persons.
- Review the current training materials and evaluate effectiveness, report any deficiencies to the DAS/ GSE Safety & Health Consultant.
- Provide specific training for non-routine tasks that are hazardous.
- Follow disciplinary procedures for DAS/ GSE Hazard Communication Program infractions.

DAS Employees

- **Do not use** any hazardous chemical or material brought from home or not approved by the DAS Supervisor.
- Do not use any hazardous chemical or material prior to receiving training.
- Report the need for training to the DAS Supervisor.
- Know where the MSDS are kept and how to obtain a copy.
- Review the MSDS to answer questions prior to use.
- Label all portable containers, assure label is legible.
- Wear all required PPE identified in MSDS.
- Attend initial training and any subsequent required training.
- **Stop use and report** any unusual reactions to building materials or yourself immediately to DAS Supervisor.

Contractor

- Bring a MSDS for every hazardous chemical or material brought onto the job site.
- Provide access to MSDS for all employees; including contractors, subcontractors, DAS employees, or other interested person's.
- Remove all hazardous chemicals, materials and MSDS when work is completed.
- Follow all requirements in Contractor's Hazard Communication Program.
- Provide a copy of Contractor's Hazard Communication Program when requested.
- Follow appropriate disciplinary actions following infraction of Contractor's Hazard Communication Program.

DAS Contract Manager

- Provide a copy of the DAS/ GSE Hazard Communication Program when requested by contractors, subcontractor's or other interested persons.
- Provide information about potential exposure to hazardous chemicals or materials on the Capitol Complex*.
- Provide the location where MSDS are kept or copies of MSDS when requested.
- Become familiar with the hazardous chemicals or materials being used at the job site.
- Provide notification to building occupants about any potential exposure to hazardous chemicals or materials.

DAS/ GSE Safety & Health Consultant

- Develop and implement the DAS/ GSE Hazard Communication Program.
- Review the DAS/GSE Hazard Communication Program periodically to assure compliance with OSHA 1910.1200.
- Provide copies of the DAS/ GSE Hazard Communication Program when requested.
- Assist in obtaining missing MSDS.
- Maintain inventory and MSDS located in the entryway of the Facilities Management Center.
- Serve as the DAS/ GSE point of contact for IOSH inspections.
- Provide the DAS/ GSE Employee Safety Program web master with the current DAS/ GSE Hazard Communication Program.
- Provide annual training materials for DAS/ GSE Supervisors.
- Answer questions and assist DAS/ GSE Supervisors in filling their responsibilities.
- Conduct periodic audit to determine effectiveness of the DAS/ GSE Hazard Communication Program.

Note

 Capitol Complex = All buildings on Capitol grounds, 150 Des Moines Street, Ankeny Labs, ABD Warehouse, Iowa Finance Authority Bldg., Vets Cemetery Complex.